



HARVEST FOUR CORNERS, LLC

CHACO CS – AQB 21-37

CARRACAS CDP CS – AQB 21-43

Summary of Direct Technical Testimony of
James Newby, Cirrus Consulting, LLC

November 15, 2021

AIR PERMITTING OVERVIEW

- New Source Review or Construction Permit
 - Permit required prior to constructing or modifying facilities that will generate emissions above the regulatory thresholds.
 - The permit does not need to be renewed.
 - The permit does not need to be modified unless the operator wants to make a change to the facility.
 - This is the point at which the facility must demonstrate compliance with state and federal air quality standards.

AIR PERMITTING OVERVIEW

- Title V Operating Permits
 - Required for larger facilities.
 - Due within one year after a new construction or modification commences operation.
 - Renewed every five years.
 - Designed to identify, in a single document, all air quality requirements applicable to a source.
 - Not intended to establish new emissions or operating limits.
 - Includes additional monitoring, recordkeeping and reporting.

AIR PERMITTING OVERVIEW

- Title V Operating Permits
 - “Insignificant” sources are those with low emission rates (i.e., <1 tpy) and no regulatory requirements.
 - Insignificant sources are included in the application, but not in the Title V permits.

CHACO COMPRESSOR STATION

- The Chaco facility compresses pipeline quality natural gas received from independent producers.
- Current Permits:
 - Construction Permit, 0759-M6, dated October 12, 2018.
 - Title V Operating Permit, P236-R2, dated August 19, 2016.
- Draft Title V Permit P236-R3:
 - Permit renewal and modification.
 - Incorporates changes made in the current NSR permit and adds pneumatic controllers to the list of insignificant sources.

CARRACAS CDP

- The Carracas facility compresses and dehydrates pipeline quality natural gas received from independent producers.
- Current Permits:
 - Construction Permit, 968-M5-R7, dated October 12, 2017.
 - Title V Operating Permit, P168-R3, dated January 5, 2016.
- Draft Title V Permit P168-R4:
 - Permit renewal.
 - Incorporates administrative changes made in the current NSR permit and adds pneumatic controllers to the list of insignificant sources.

STARTUP, SHUTDOWN, AND MAINTENANCE (SSM) AND MALFUNCTION LIMITS

- Guardians comment: the SSM and malfunction emission limits are unenforceable as a practical matter.
- SSM emissions are those associated with scheduled startups, shutdowns, and maintenance.
- Malfunction emissions are most commonly those associated with unscheduled startups, shutdowns, and maintenance.
- Malfunction emissions can also include other malfunctions at the facility.

STARTUP, SHUTDOWN, AND MAINTENANCE AND MALFUNCTION LIMITS

- Condition A107 and the General Conditions require that Harvest:
 - Monitor all blowdown events.
 - Perform an annual inlet gas analysis.
 - Calculate rolling 12-month emission totals.
 - Keep records of all data, test results, and calculations.
 - Submit semi-annual reports to the Bureau.

SUFFICIENT PERIODIC MONITORING

- Guardians Comment: draft permits do not include sufficient monitoring to ensure compliance with lb/hr limits.
- Periodic Short-Term NO₂ Limits – Engines and Turbines:
 - Periodic emissions testing is required.
 - Once per calendar year at the Chaco facility (Condition A206.A).
 - Quarterly at the Carracas facility (Condition A201.B).
 - Other conditions in the draft permits also help ensure compliance with the emission limits.
 - Opacity Limits.
 - Maintenance Requirements.

SUFFICIENT PERIODIC MONITORING

- Guardians Comment: draft permits do not include sufficient monitoring to ensure compliance with lb/hr limits.
- Truck Loadout:
 - Truck loadout is permitted at the Chaco facility (not Carracas).
 - Short-term truck loadout emissions rates are based on one truck loadout per hour.
 - Practical limit given the time it takes to connect, load and disconnect.
 - Monthly monitoring of annual throughput required.
 - Bureau states should be annual (hourly an error).

NAAQS COMPLIANCE

- Guardians Comment: Bureau has not demonstrated recent NSR actions will not cause or contribute to violations of NAAQS.
- NAAQS compliance for Title V renewal applications is “based on compliance with the relevant terms and conditions of the current operating permit.” 20.2.70.300.D(10)(a)(ii) NMAC.
- Application included a certification of compliance with existing Title V permit requirements.